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UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION

UNITED STATES OF AMERICA, <p style="text-align: right;">Plaintiff,</p> v. JESSICA McLELLAN, <p style="text-align: right;">Defendant.</p>	No. CR 07-00173 SBA STIPULATED REQUEST FOR MODIFICATION OF PROBATION TO PERMIT INTERNATIONAL TRAVEL, AND PROPOSED ORDER
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The United States of America, by and through its counsel the United States Attorney, and defendant Jessica McLellan, by and through undersigned counsel, hereby stipulate and agree as follows:

1. Ms. McLellan pled guilty on October 23, 2006, to one count charging her with securities fraud in violation of 15 U.S.C. §§ 78j(b) & 78ff and 17 C.F.R. § 240.10b-5. United States District Court Judge Percy Anderson of the Central District of California sentenced Ms. McLellan primarily to three years of probation and 300 hours of community service. *See United States v. McLellan*, No. CR 03-00940-PA (C.D. Cal.),

Docket # 75. The case was transferred in May 2007 to this Court pursuant to 18 U.S.C. § 3605. Docket # 1.

2. On May 8, 2007, this Court modified the conditions of Ms. McLellan's probation to allow her to travel domestically and internationally for business purposes as permitted by her probation officer. Docket # 3.

3. Ms. McLellan now seeks to travel to Asia for pleasure, where she will, among other travels, visit her brother in Hong Kong. She plans to depart on February 15, 2008, and return to the United States within forty-five days.

4. Undersigned counsel for Ms. McLellan spoke to Ms. McLellan's probation officer, USPO Wayne Mirikatani, on February 6, 2009. Mr. Mirikatani stated that he did not oppose Ms. McLellan's travel request.

5. Wherefore, the undersigned parties request that Ms. McLellan's terms of probation be modified to permit Ms. McLellan to travel to Hong Kong, Thailand, India, Nepal and Laos between February 15 and April 2, 2009.

Respectfully submitted,

Dated: February 6, 2009

THOMAS O'BRIEN
United States Attorney for the Central District
of California

By: _____/s/
Michael R. Wilner
Assistant United States Attorney
Central District of California
Counsel for the United States of America

1 Dated: February 6, 2009

ARGUEDAS, CASSMAN & HEADLEY, LLP

2 By: _____/s/

Raphael M. Goldman

3 Counsel for Jessica McLellan

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5 PURSUANT TO STIPULATION, it is SO ORDERED.

6 2/11/09


United States District Court Judge